

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

HENG REN INVESTMENTS LP,

Plaintiff,

v.

SINOVAC BIOTECH LTD. and  
WEIDONG YIN,

Defendants.

Civil Action No. 1:19-cv-11612-NMG

**ORAL ARGUMENT REQUESTED**

**DEFENDANT SINOVAC BIOTECH LTD.'S MOTION FOR RECONSIDERATION  
OR, IN THE ALTERNATIVE, FOR CERTIFICATION UNDER 28 U.S.C. § 1292(b) AND  
FOR A STAY OF PROCEEDINGS**

Defendant Sinovac Biotech Ltd. ("Sinovac"), by and through its undersigned counsel, hereby moves for reconsideration of the Court's denial, in part, of Sinovac's motion to dismiss Plaintiff's First Amended Complaint, as set forth in the Court's March 3, 2022 Memorandum and Order (Dkt. No. 58), or, in the alternative, for certification of an interlocutory appeal of that denial pursuant to 28 U.S.C. 1292(b), and a stay of proceedings pending disposition of this motion and of any related appeal. As grounds therefor, Sinovac relies on its memorandum of law and accompanying declaration filed concurrently herewith.

**REQUEST FOR ORAL ARGUMENT**

Pursuant to Local Rule 7.1(d), Sinovac respectfully requests that the Court schedule oral argument on this motion.

Dated: March 21, 2022

Respectfully submitted,

LATHAM & WATKINS LLP

/s/ Eric F. Leon

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*Attorneys for Defendant Sinovac  
Biotech Ltd.*

**LOCAL RULE 7.1 CERTIFICATION**

Pursuant to Local Rule 7.1(a)(2), undersigned counsel hereby certifies that he has conferred with counsel for Plaintiff in a good faith effort to resolve or narrow the issues raised in this motion, and Plaintiff's counsel opposes this motion.

/s/ Eric F. Leon  
Eric F. Leon

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing, and paper copies will be sent to those identified as non-registered participants on March 21, 2022.

/s/ Eric F. Leon  
Eric F. Leon